

August 12, 2022

**VIA ECF & ELECTRONIC MAIL**

Hon. Andrew L. Carter Jr.  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007  
ALCarterNYSDChambers@nysd.uscourts.gov

Re: *In re Bit Digital, Inc. Sec. Litig.*, No. 1:21-cv-00515-ALC (S.D.N.Y.)

Dear Judge Carter:

We are pleased to advise the Court the parties have reached an agreement in principle to settle all claims in this action on a class-wide basis, subject to the Court's approval under Fed. R. Civ. P. 23(e). The parties expect to fully reduce their agreement to writing, and thereafter, Plaintiffs will move pursuant to Fed. R. Civ. P. 23(e)(1) for an order certifying a settlement class for the purposes of judgment on the settlement proposal and authorizing the publication of notice to the settlement class (the "Preliminary Approval Motion"). Defendants will not oppose the Preliminary Approval Motion.

Given that motions are currently pending before the Court (ECF Nos. 40, 57), we wanted to inform the Court promptly of this development.

Very truly yours,

/s/ Jeffrey C. Block  
Jeffrey C. Block  
Jacob A. Walker  
**Block & Leviton LLP**  
260 Franklin Street, Suite 1860  
Boston, MA 02110  
(617) 398-5600

/s/ Stuart Kagen  
Stuart Kagen  
Kagen, Caspersen & Bogart PLLC  
757 Third Avenue, 20th Floor  
New York, NY 10017  
(212) 880-2045